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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**  
10 **AT TACOMA**

11 JAYNE WESTMAN, an individual,

12 Plaintiff,

13 vs.

14 OREGON MUTUAL INSURANCE

15 COMPANY, a foreign corporation; JANE

16 and JOHN DOES 1-5,

17 Defendants.

NO. 3:24-CV-05915

STIPULATED MOTION TO  
CONTINUE TRIAL DATE AND CASE  
DEADLINES

18 **I. STIPULATION**

19 Pursuant to LCR 7(j), Plaintiff Jayne Westman and Defendant Oregon Mutual Insurance  
20 Company respectfully submit this stipulated motion to continue the trial date from December 15,  
21 2025, to April 20, 2026, or to such other time as the court deems appropriate, and to extend all  
22 outstanding pre-trial deadlines for a corresponding amount of time.

23 Good cause exists to grant this motion because the undersigned defense counsel  
24 anticipates taking maternity leave from December 2025, when trial is currently set to begin,  
25 through early spring 2026. Counsel for the parties believe they can complete discovery and  
comply with the amended deadlines proposed below.

STIPULATED MOTION TO CONTINUE TRIAL DATE AND CASE  
DEADLINES – 1

066570.000006 1835625

NO.: 3:24-CV-05915

**REED McCLURE**

ATTORNEYS AT LAW  
FINANCIAL CENTER  
1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152

The parties propose the following case schedule:

	<b>Current</b>	<b>Proposed</b>
Deadline for filing amended pleadings	May 19, 2025	Sep. 22, 2025
Disclosure of expert testimony under Fed. R. Civ. P. 26(a)(2)	May 19, 2025	Sep. 22, 2025
Disclosure of rebuttal expert testimony under Fed. R. Civ. P. 26(a)(2)	Jun. 18, 2025	Oct. 22, 2025
All motions related to discovery filed by (see LCR 7(d))	Jun. 18, 2025	Oct. 22, 2025
Discovery completed by	Jul. 18, 2025	Nov. 21, 2025
All dispositive motions and motions challenging expert witness testimony filed by (see LCR 7(d))	Aug. 18, 2025	Dec. 22, 2025
Settlement conference under LCR 39.1(c)(2) held by	Oct. 16, 2025	Feb. 19, 2026
All motions in limine filed by (see LCR 7(d))	Nov. 5, 2025	Mar. 11, 2026
Deposition Designations submitted to the Court	Nov. 24, 2025	Mar. 30, 2026
Agreed pretrial order due	Nov. 24, 2025	Mar. 30, 2026
Trial briefs, proposed voir dire questions, and proposed jury instructions filed by	Dec. 1, 2025	Apr. 6, 2026
Pretrial conference	Dec. 8, 2025	Apr. 13, 2026
Deadline for filing amended pleadings	<b>Dec. 15, 2025</b>	<b>Apr. 20, 2026</b>

PFAU, COCHRAN, VERTETIS & AMALA, PLLC

DATED: May 2, 2025

By /s/ Kevin M. Hastings

Kevin M. Hastings, WSBA #42316  
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Tacoma, WA 98402-4413  
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*Of Attorneys for Plaintiff*  
[kevin@pcvalaw.com](mailto:kevin@pcvalaw.com)

DATED: May 2, 2025

REED MCCLURE

By /s/ Julia D. Nordlinger

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STIPULATED MOTION TO CONTINUE TRIAL DATE AND CASE  
DEADLINES – 2

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**ORDER**

IT IS SO ORDERED. Trial is continued to April 20, 2026. The Court shall issue and amended Order Setting Trial and Related Dates extending all related pretrial deadlines similar amount of time, beginning with the deadlines for filing amended pleadings and for disclosure of expert testimony.

DONE this 5th day of May, 2025.

  
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HON. JAMAL N. WHITEHEAD  
U.S. District Court Judge

STIPULATED MOTION TO CONTINUE TRIAL DATE AND CASE  
DEADLINES – 3

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